

United States Court
District of Oregon
Portland

United States of America,
Plaintiff,

Case

NO. 3:17-CR-00400-HZ

* URGENT *

-V-

Jason Paul Schaefer,
Defendant,

Motion For Leave
to Depose an Essential
Witness

Comes Now, Defendant Pro-Se Jason Paul Schaefer, requesting leave to Depose a necessary witness who may not be available for trial.

The Government provided notice at a recent hearing on April 10th, 2019 that a "key witness" was having surgery in 2 weeks (April 24th) and would require an additional 2 weeks to recover.

For that reason, the government intends to delay trial. Trial has currently been delayed 19 months. Trial is scheduled for 7-14 days, starting May 6th, 2019.

The Government has not established how this witness is relevant to this case, or who this witness is. This witness may be fabricated in an attempt to delay this case.

The defense seeks to depose this witness with a video recording, which can be presented

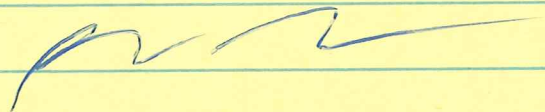
to the jury in trial. The Attorney for the government should conduct a similar deposition.

The Defense bases this motion off of similar situations described in Title 18 of United States Code where a witness is in a foreign country or otherwise anticipated to be unavailable.

The Defense respectfully requests this motion be reviewed as soon as possible, and for the foregoing reasons, be GRANTED.

Respectfully Submitted to the courts this April
11th, 2019.

Jason Schaefer



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